

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
TBS OCEAN CARRIERS, LTD., :  
 :  
 Plaintiff, :  
 :  
 -against- :  
 :  
 HANJIN TRANSPORTATION CO., LTD., :  
 :  
 Defendant. :  
-----X

ECF  
AFFIDAVIT PURSUANT  
TO SUPPLEMENTAL  
RULE B

07 Civ. 8481 (GEL)

STATE OF NEW YORK )  
 : ss.:  
COUNTY OF NEW YORK )

TULIO R. PRIETO, being duly sworn, deposes and  
says:

1. I am a member of the Bar of this Court and a  
member of the firm of Cardillo & Corbett, attorneys for the  
Plaintiff herein. I am familiar with the facts of this case  
and make this affidavit in support of Plaintiff's prayer for  
the issuance of a Writ of Maritime Attachment and Garnishment,  
pursuant to Rule B of the Supplemental Rules for Certain  
Admiralty and Maritime Claims of the Federal Rules of Civil  
Procedure.

2. I have attempted to locate defendant, HANJIN  
TRANSPORTATION CO., LTD., within this District. As part of my  
investigation to locate the Defendant within this District, I  
examined the telephone company information directory, as well  
as the white and yellow pages of New York listed on the

Internet or World Wide Web, and did not find any listing for the Defendant.

3. The database of the office of the New York State Secretary of State was searched to determine if Defendant is qualified to do business in New York. The database shows an entity by the name of HANJIN TRNASPORTATION CO., LTD., not HANJIN TRANSPORTATION CO., LTD. In any event, that entry does not show an address for such entity within the Southern District of New York. Nor does that entry show an agent for service of process within the Southern District of New York.

4. On information and belief, Defendant, HANJIN TRANSPORTATION CO., LTD., was and still is, a foreign corporation, or other business entity, organized under, and existing by virtue of foreign law, with an address at 21<sup>st</sup> Floor, Marine Center 118, Namdaemunro 2-GA, Jung-Gu, Seoul, Korea.

5. In consequence of these inquiries your deponent believes that the Defendant cannot be found within the Southern District of New York.

6. Upon information and belief, Defendant has, or will have during the pendency of this action, tangible and intangible property within the District in the hands of ABN Amro Bank NV, American Express Bank, Bank of America, Bank of Communications Co. Ltd. New York Branch, Bank of New York,

Barclays Bank, BNP Paribas, Citibank, Deutsche Bank, HSBC (USA) Bank, J.P. Morgan Chase, Standard Chartered Bank, UBS AG and/or Wachovia Bank, in the form of accounts and/or fund transfers identified as follows:

- a) accounts in the name of HANJIN TRANSPORTATION CO., LTD., or
- b) electronic funds transfers listing HANJIN TRANSPORTATION CO., LTD., as a beneficiary of the funds transfer, or
- c) electronic funds transfers showing HANJIN TRANSPORTATION CO., LTD., as the remitting party or ordering customer.

7. This is TBS OCEAN CARRIERS, LTD.'s first request for this relief.

WHEREFORE, TBS OCEAN CARRIERS, LTD. respectfully requests that the Court authorize the issuance of process in the form of a Writ of Maritime Attachment and Garnishment seeking attachment and garnishment of HANJIN TRANSPORTATION CO., LTD.'s tangible and intangible property within this District.

  
TULIO R. PRIETO

Sworn to before me this  
1<sup>st</sup> day of October, 2007

  
NOTARY PUBLIC

CHRISTOPHIL B. COSTAS  
Notary Public, State of New York  
No. 31-0773693  
Qualified in New York ~~COUNTY~~  
Commission Expires April 30, 2011